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 10 Attorneys for Defendant
 11 GABRIEL GONZALES

7
UNITED STATES DISTRICT COURT
 8
NORTHERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,

10 Case No. 4-20-70327 MAG [DMR]

11 Plaintiff,

12 v.

13 GABRIEL GONZALES et al,

14 Defendant.

**GABRIEL GONZALES' MODIFIED EX
 PARTE APPLICATION FOR ORDER
 PERMITTING TRAVEL FROM HOUSE;
 [Proposed] Order**

15 I, Ashley Riser, declare:

16 1. I represent Defendant GABRIEL GONZALES in the above-entitled matter. He is currently
 17 released on an unsecured \$75,000 bond with home confinement. The purpose of this
 18 application is to request that Mr. Gonzales be allowed to visit his grandparents for
 19 Thanksgiving on November 26, 2020. He will leave the house at 11:00 AM and he will
 20 return home by 8:30 PM.

21 2. Mr. Gonzales' grandparents live in San Pablo, and Mr. Gonzales' mom will drive Mr.
 22 Gonzales to and from the event. When Mr. Gonzales was released from custody, the Court
 23 ordered Mr. Gonzales to live with his mom.

24 3. During this event, Mr. Gonzales will be under the supervision of his grandparents and/or
 25 mom at all times.

26 4. This event will have a limited number of people, and it will follow all social distancing and

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1 other COVID prevention guidelines.

2 5. This event will not have alcohol or narcotics because Mr. Gonzales' grandparents do not
3 allow alcohol or narcotics into the home due to their sobriety.

4 6. Mr. Gonzales does not have any Pretrial Release violations.

5 7. A March 9, 2020 Complaint was filed alleging Mr. Gonzales' violation of 21 U.S.C. §
6 841(a)(1), (b)(1)(B).

7 8. I contacted AUSA Joseph Tartakovsky, who informed me that does not object to Mr.
8 Gonzales' request.

9 9. Pretrial Services Officer Kalisi Kupu, who monitors Mr. Gonzales, informed me that she
10 does not object to this request. Further, I provided Officer Kupu with the contact
11 information for Mr. Gonales' grandparents and mom.

12 10. Based on the foregoing, I respectfully request that the conditions of Mr. Gonzales' release
13 be modified so that he may be permitted to travel to travel to his grandparents' house on
14 November 26, 2020. All other conditions of Mr. Gonzales' release shall remain the same.
15 Furthermore, Mr. Gonzales shall inform his pretrial services officer of all travel-related
16 details.

17
18 I declare under penalty of perjury under the laws of the United States that the foregoing is
19 true and correct.

20 DATED: November 23, 2020

21 _____ /s/
22 ASHLEY RISER
23 Attorney for GABRIEL GONZALES
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1 [PROPOSED] ORDER
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4 Based on the foregoing, and good cause appearing:
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7 **IT IS HEREBY ORDERED** that the conditions of Defendant GABRIEL GONZALES'
8 release shall be modified as follows:
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10 Mr. Gonzales is permitted to travel to his grandparents' house on November 26, 2020 from
11 11:00 AM to 8:30 PM. All other terms and conditions shall remain in place.
12

13 DATED: _____
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15 _____
16 HONORABLE JUDGE DONNA M. RYU
17 United States Magistrate Court Judge
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